



Discussion of Cross Bore Safety Association Direction and Benefits

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The passionate response and varied opinions indicate that cross bores are indeed an issue worthy of our efforts. The following discusses areas of action and benefits that can be achieved.

Some goals and observations that provide points of discussion and that fit the mission statement of the association include:

- 1) Identifying the risks to and education of drain cleaners
- 2) The creation of detailed standards or guidelines that bring thoughtful and diverse views to construction, other than locating prior to installation.
 - a) The HDD Best Practices does not provide for details in this regard, but does instruct to locate before installing. Expansion of the NASTT course is appropriate.
 - b) The reality is that no comprehensive checking/verification has occurred before recent years. It is apparent that not all gas line installers adequately follow good practices for a variety of reasons, including competitive economics.
 - c) Without uniform good practices that are followed by ALL of the industry, competition has a tendency to drive the quality to the lowest common denominator.
- 3) Providing solutions for legacy work where other organizations do not have it as a focus.
- 4) Plowing of new gas lines has been off of the radar and be needs to be included as it is now considered a trenchless technology.
- 5) Mole installation needs to be addressed in a comprehensive manner that recognizes it as a point and shoot method, without intervening guidance in current installation procedures.

Many gas company owners have elected to modify the requirements for their gas distribution system operations:

- 1) Some are requiring post construction locates as an immediate follow-up to the gas line installation
- 2) Some have and are operating massive legacy locating operations on high risk areas.

These can be perceived as added burden to the gas utility owner and the construction company. Or more correctly, they can be perceived as:

- 1) Limiting damage and injury to the public

- 2) Limiting risk to installers
- 3) Acting in a pro-active moral manner
- 4) Increasing the ability to obtain liability insurance for construction companies
- 5) Being a cost effective solution to known problems. Planned work is lower cost than emergency work
- 6) Reducing punitive damages
- 7) Maintaining the good will of the utility owners and installing companies
- 8) Allowing for industry consensus solutions vs. a legislated solution

Several issues must be solved in a consensus manner:

- 1) Who pays
 - a) The gas utilities are already paying for revised installation methods and legacy in many cases
 - b) Ultimately the rate payer will pay through higher rates. Increased rates should be justified, due to continued savings and minimized surface disruption from trenchless methods.
- 2) Who is responsible for certain locates, i.e. sewers
 - a) Many states have passed laws requiring the owners of sewers to be responsible for locates.
 - b) Sewer system owners have expressed concern over the fairness of this issue, Installers want to treat sewer owners the same as other utilities that are required to located. The association does not need to participate in this determination.
 - c) Homeowners that may be required to locate sewers are at risk of saying "Ok, if that is the case, forget about giving me natural gas". Again, that is not a association determination. That will be sorted out in other forums on a homeowner, city, state or national level.
 - d) If the sanitary sewer utility owner has increased costs, they will pass those rates along to the user through rate increases.
 - e) See the 1999 Case before the Kentucky Utility Commission, www.cbsa.org
- 3) Recognize the benefit to the public and the rate payer:
 - a) Increased costs for safety will eventually be borne by the rate payers
 - b) Is this fair. Of course it is. The users should fund proper and safe transmission of utilities
 - c) The interesting opportunity that needs to be developed is to coordinate efforts. If a gas utility will be in sewers, they have the opportunity to gain substantial information for condition assessment of sewers. Guidelines that encourage coordinating efforts with sharing of costs to gain better data seems to be in the home or business owners favor. If cleaning is required, it seems that the sewer utility will benefit. Simultaneously, the most opportune time to update condition assessment would be in conjunction with these efforts.
 - d) Uniquely, NASTT's members represent wide interest groups that sit on both sides of this issue. NASTT is a logical coordinator of such multiple public benefits.
- 4) The benefits to commercial interests need to be revealed and defined
 - a) Currently proactive, responsible construction companies have demonstrated their commitment to safe installation techniques.

- b) Many of the efforts for improved construction techniques have unfairly burdened financially those proactive companies
 - c) Standardized guidelines/methodologies that are comprehensive allows for contractors to compete fairly and not be penalized financially for higher levels of safety techniques that addresses cross bore issues
 - d) Standardized methods allow for utility owners to have the benefit of a comprehensive consensus driven guideline.
 - e) Contractors and utility owners that adopt a thoughtful comprehensive consensus methodology will likely be better protected from excessive punitive damage claims.
 - f) Implementation of standardized methodologies can bring the rapid ability for adopting companies to change without the time and expense of developing internal documentation.
- 5) Protect, on a long term basis, users and maintenance personnel
- a) Damage prevention needs to extend to the end user (homeowner, drain cleaner) on a long term basis, not just for the immediate installation time line. It is logical and moral correct.
 - b) This aspect has largely been unaddressed with previous efforts from various organizations.
- 6) The time line of legacy inspections must be explored
- a) An important aspect of developing comprehensive guidelines should be the inclusion of realistic timelines for adoption to the new construction projects and to addressing of high risk legacy areas for cross bores
 - b) Precedents that seem to be appropriate include the "Clean Air Act' that had some provisions that extended past 10 years for full implementation
 - c) A "crash" program, especially for legacy cross bore inspections, may result in poorly educated individuals and inaccurate results.
 - d) There should be a "ramping up" of efforts that recognize shortage of properly educated personnel in the field, quality control and operations management. The growth should follow a logical achievable timeline.
 - e) NASTT's training capability and strategic membership would be logical to solve much of the training needs with cooperation of other organizations.
- 7) A coalition efforts several organizations is required for effective results
- a) This is a large task that needs to be solved by committed efforts
 - b) There may be an appropriate time that another group is found or created to take over the initial efforts of the Cross Bore Safety Association.
- 8) Define organizations that will be responsible for maintaining guidelines, standards and training
- a) Numerous organizations are in the loop with the association efforts, note the email addresses
 - b) Other groups need a higher level of or a more direct involvement, including
 - i) Drain cleaners
 - ii) Researchers of new techniques
 - iii) Governmental
 - iv) Manufacturers

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